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October 6, 2022

VIA ECF

Honorable Barbara C. Moses
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: Ransom v. Andrews, 21-CV-6343 (JPO) (BCM)

Your Honor:

I am an Assistant Corporation Counsel in the office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendant Correction Officer Andrews, in the above referenced matter. Defendant writes to respectfully request two additional days to respond to plaintiff's motion for sanctions, from October 6, 2022, until October 11, 2022. See Docket Entry No. 59. This is the second request for an extension of this deadline. Defendant was unable to obtain plaintiff's position due to his incarcerated status.

By way of brief background, plaintiff, *pro se*, filed a motion on September 26, 2022, requesting that the Court grant him sanctions based on a purported failure to preserve certain video evidence. See Docket Entry No. 59. The Court granted defendants' one week extension request to respond to that motion, until today, October 6, 2022. See Docket Entry No. 62. Defendant has been working to gather the necessary documents, and affidavits to respond. However, this effort has taken more time than expected, particularly in light of Your Honor's Order, reminding the defendant to rely on admissible evidence in support of his response. Therefore, defendant is asking for an additional two business days, until Tuesday, October 11, 2022, to submit his response.

Application GRANTED. SO ORDERED.

Barbara Moses
United States Magistrate Judge
October 7, 2022

Thank you for your consideration herein.

Respectfully submitted,
/s/
Caroline McGuire
Assistant Corporation Counsel

VIA MAIL

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